

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**DERRICK PETROLEUM SERVICES,
PLAINTIFF,**

V.

**PLS, INC.
DEFENDANT.**

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**CIVIL ACTION NO. 4:14-CV-01520
JURY DEMANDED**

**DEFENDANT PLS, INC.'S OBJECTIONS TO
DEPOSITION EXCERPTS OF MANGESH HIRVE**

Defendant PLS, Inc. ("PLS") objects to the excerpts proposed by Plaintiff, Derrick Petroleum Services as follows:

In addition to the objections that follow in the chart below PLS generally objects to the offer as it is unreasonably cumulative, duplicative and disruptive to the proceeding. That is, PLS carefully selected passages to keep the offer to half an hour. Conversely, Derrick's offer is nearly an hour and a half. In addition to the foregoing statement, PLS specifically objects as follows:

<u>PAGE/LINE</u>	<u>OBJECTION</u>
48/12 thru 50/6	This examination is about some consulting work done for Deloitte and is not relevant to the issues of ownership or termination of the Joint Venture.
53/24 thru 54/4	The witness does not know the answer to the questions so the question is irrelevant.
98/3 thru 6	The witness does not know the answer to the question so the question cannot be relevant.
100/19 thru 102/9	The testimony in this section is about breaches claimed to exist in regard to PLS's marketing effort. It is not relevant to this phase of the Trial.

WHEREFORE, PREMISES CONSIDERED, PLS, Inc respectfully prays that all parties take notice of these objections to the deposition of Mangesh Hirve.

HIRSCH & WESTHEIMER, P.C.

By: /s/Eric Lipper

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**ATTORNEYS FOR DEFENDANT,
PLS, INC.**

CERTIFICATE OF SERVICE

I do hereby certify that on this November 7, 2014, I electronically filed the foregoing with the Clerk of Court using the ECF system which sent notification of such filing to the following:

Brendan D. Cook
Baker & McKenzie, LLP
700 Louisiana, Suite 3000
Houston, Texas 77002
Via Facsimile No. 713-427-5099

By: /s/Eric Lipper
Eric Lipper